

May 5, 2014

U.S. House of Representatives Washington, D.C. 20515

Dear Representative:

JOHN H. BUHRMASTER Chairman

JACK A. HARTINGS Chairman-Elect

REBECA ROMERO RAINEY

PRESTON KENNEDY Treasurer

TIMOTHY K. ZIMMERMAN Secretary

WILLIAM A. LOVING, JR. Immediate Past Chairman

CAMDEN R. FINE President and CEO

On behalf of the nearly 6,500 community banks represented by ICBA, I write to express our support for the CFPB Rural Designation Petition and Correction Act (H.R. 2672), which is scheduled for floor consideration this week. Introduced by Rep. Andy Barr, H.R. 2672 would create a process in which individuals could petition the Consumer Financial Protection Bureau (CFPB) to have the rural status of a county reassessed. H.R. 2672 is fully consistent with ICBA's Plan for Prosperity: A Regulatory Relief Agenda to Empower Local Communities. **ICBA urges all members of the House to vote YES on H.R. 2672.**

The CFPB's annual designation of "rural" counties is used to administer a number of mortgage rules, including the ability-to-repay rule's restriction on qualified mortgage (QM) balloon loans, which are protected from heightened legal risk. In addition, the rural designation applies to rules relating to escrow requirements for higher-priced mortgage loans, as well as the second appraisal requirement for certain higher-priced mortgage loans. ICBA continues to express serious concerns with the CFPB's rural designation and its negative impact on community bank mortgage lending. The petition process created by H.R. 2672 would allow for a broader range of evaluation criteria, more accurately identify rural counties, and help ensure continued access to mortgage credit in those communities.

Thank you for your consideration.

Sincerely,

/s/

Camden R. Fine President & CEO